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June 3, 2014

**VIA ECF**

The Honorable Martin Glenn  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004

Re: In re Residential Capital, LLC, et al., Case No. 12-12020 (MG)

Dear Judge Glenn:

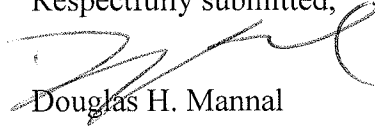
I am writing as counsel to the ResCap Liquidating Trust (the “**Liquidating Trust**”), the successor in interest to the debtors in the above-referenced chapter 11 cases (collectively, the “**Debtors**”), in connection with the *Motion of the ResCap Liquidating Trust for an Order Enforcing Plan Injunction Against Karla Brown* [Docket No. 6687] (the “**Motion**”) seeking to enforce the injunction provisions of the confirmed plan of reorganization and enjoin Karla Brown (the “**Plaintiff**”) from further prosecution of her pending action in Massachusetts state court against Philip Brown, a former employee of Debtor GMAC Mortgage, LLC. The Liquidating Trust is submitting this letter with the consent of the Plaintiff.

Since the adjournment of the hearing on the Motion to June 10, 2014, the parties have engaged in extensive good-faith negotiations in an effort to reach a global settlement that would resolve the Motion, as well as the Plaintiff’s claims against the Debtors and Philip Brown. As we previously informed the Court in a letter dated May 27, 2014 [Docket No. 7005], the parties reached an agreement on a global settlement and are in the process of memorializing the settlement in writing.

As of this writing, although the essential terms are agreed upon, the parties have not finalized the settlement papers. To allow the parties additional time to document the settlement, the parties agreed to adjourn the hearing on the Motion from June 10, 2014 to June 26, 2014. We will provide the Court with a further update as to this matter by June 12, 2014 (*i.e.*, two weeks prior to the hearing).

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Douglas H. Mannal', is written over the typed name.

Douglas H. Mannal

cc: Kenneth H. Eckstein, Esq.  
Max Weinstein, Esq.  
Paul R. Collier, Esq.  
Richard Briansky, Esq.  
Peter S. Kravitz, Esq.  
Daniel J. Flanigan, Esq.  
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